

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JUAN EDUARDO COLON MARRERO

DEBTOR

CASE NO. 22-00979/MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 62**

TO THE HONORABLE COURT:

NOW COMES, JUAN EDUARDO COLON MARRERO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 15, 2024, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 62, alleging that the Debtor has defaulted in his Plan payments in the sum of \$700.00.

2. On March 14, 2024, the Debtor met with his undersigned attorney and respectfully admits that he did incur in the Plan arrears due to certain economic problems, and respectfully states that he is in the process of obtaining the monies to cure the Plan arrears in the present case.

3. The Debtor respectfully requests additional time of thirty (30) days within to resolve this matter in order to adequately reply to *Trustee's Motion to Dismiss*, Docket No. 62. This extension of time to expire on April 13, 2024.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to his address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 14th day of March, 2024.

/s/Roberto Figueroa Carrasquillo
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